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U.S. COURTS  
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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF IDAHO  
AT BOISE

In Re:

TIMOTHY JAMES OLD and  
FRANCES JUSTINE OLD,

Debtors.

BANKRUPTCY NO. 02-3779

CHAPTER NO. 7

NOTICE OF MOTION FOR RELIEF FROM  
STAY

TO: CLERK OF THE U.S. BANKRUPTCY COURT,  
TIMOTHY JAMES OLD and FRANCES JUSTINE OLD, Debtors  
LAWRENCE G. SIRIALL, JR., Attorney for Debtors,  
LOIS K. MURPHY, Trustee and  
U.S. TRUSTEE

PLEASE TAKE NOTICE that within thirty-three (33) days of the date of this notice, Long Beach Mortgage Company and its servicing agent Washington Mutual Bank and its successors and assigns shall ask the United States Bankruptcy Court for an order granting relief from the automatic stay imposed by 11 U.S.C. § 362(a), unless a party to this proceeding shall file a response to the motion and schedule, within thirty (30) days of the date of this notice, a hearing with the U.S. Bankruptcy Court for the District of Idaho. Pursuant to 11 U.S.C. § 362(d) the automatic stay is terminated 30 days after request for relief, unless the court, after notice and hearing, orders such stay continued in effect pending the conclusion of final hearing. A final hearing, if any, shall commence not later than thirty (30) days after the conclusion of the preliminary hearing. Failure to schedule a hearing and notify all parties, including this creditor, shall preclude further objections to the motion for relief from stay.

NOTICE OF MOTION FOR RELIEF  
FROM STAY - 1

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Law Offices  
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Seattle, WA 98104  
Telephone (206) 676-9640

Respectfully submitted this 24 day of February, 2003.



Susan J. Robinson, ISB # 04460

ROBINSON TAIT

Attorneys for Long Beach Mortgage Company and its  
servicing agent Washington Mutual Bank and its successors  
and assigns

### CERTIFICATE OF MAILING

I hereby certify that on this 25 day of February, 2003, a true and correct copy of the  
foregoing was mailed, postage prepaid, first class to the following:

Timothy James Old  
Frances Justine Old  
1587 N Ellington Way  
Eagle, ID 83616

Lawrence G. Sirhall, Jr.  
POB 1112  
Boise, ID 83701

Lois K. Murphy  
P. O. Box 609  
Kuna, ID 83634

US Trustee  
Old Post Office Building  
304 North Eighth Street  
Boise, ID 83702

Ada County Treasurer  
PO Box 2868  
Boise, ID 83701



Susan J. Robinson, ISB # 04460

NOTICE OF MOTION FOR RELIEF  
FROM STAY - 2

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